

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

Jeffrey W. Carpenter,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Cause No. 3:23-CV-00769-N
	§	
Twin City Fire Insurance Company,	§	
	§	
<i>Defendant.</i>	§	

**TWIN CITY FIRE INSURANCE COMPANY’S  
UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
FILE REPLY IN SUPPORT OF ITS MOTION FOR PROTECTION**

Twin City Fire Insurance Company’s reply in support of its motion to for protection (Doc. Nos. 36 and 37) is currently due on November 7, 2023. Twin City respectfully requests a seven-day extension, rendering the reply brief due on Tuesday, November 14, 2023.

Twin City’s counsel, the undersigned, needs additional time to prepare the reply due to a surgical procedure that took place on October 27, 2023, with follow up appointments on November 2 and 3, and on-going recovery.

An extension is also requested because the Firm is currently in the process of moving offices from the 25<sup>th</sup> and 26<sup>th</sup> floors of Two Allen Center in Houston to the 13<sup>th</sup> and 14<sup>th</sup> floors, necessitating the dismantling of files and computer equipment.

Further, an extension is requested due to counsel’s counsel’s involvement in the following matters:

- Preparing briefing concerning a contentious supersedeas bond challenge due on November 8, 2023, and appellant’s brief, originally due on November 1, 2023, but currently due on December 1, 2023, in *MKM Engineers, Inc. et al. v. Guzder*, No. 14-23-0016-CV, in the Fourteenth Court of Appeals.

- Preparing petitioner's reply brief in support of petition for review in *Esther Akindayomi, et al. v. Rio Grande Regional Hospital, Inc.*, No. 22-0760, in the Texas Supreme Court.
- Ongoing review of a lengthy appellate record in an appeal following a jury trial in *Monique Mandell v. Fatima Breland*, No. 14-23-00440-CV, and preparation for oral argument in a related mandamus proceeding, *In re Mandell*, No. 14-23-00727-CV, scheduled for November 14, 2023.

Respectfully submitted,

CHAMBERLAIN, HRDLICKA, WHITE,  
WILLIAMS & AUGHTRY, P.C.

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LOCAL COUNSEL FOR TWIN CITY FIRE  
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**CERTIFICATE OF CONFERENCE**

I conferred with plaintiff's counsel concerning the relief requested in this motion, and counsel informed me that plaintiff is unopposed.

/s/ Steven J. Knight  
STEVEN J. KNIGHT

**CERTIFICATE OF SERVICE**

A true and corrected copy of the foregoing was served on all counsel of record via the court's e-filing system on November 7, 2023.

/s/ Steven J. Knight  
STEVEN J. KNIGHT